

EIV

A Review

Of

The Enterprise Income Verification System

September 2008

Prepared Exclusively for

The Michigan State
Housing Development Authority

by Ross Business Development, Inc.

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Disclaimer

"The material contained in this document is not comprehensive of the continually emerging issues surrounding policies in The Multifamily Housing industry. In addition, the handbook guidance is derived from The HUD Handbook 4350.3 Rev 1 Change 2 released in July 2007 and subsequent notices, the TRACS MAT Guide and the EIV Guides.

The student should understand that these training materials are not designed for, nor should be relied upon, as a source of legal guidance or as a final authority with respect to any particular circumstance.

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Owners and management should seek competent legal advice in developing and carrying out resident selection and fair housing policies and procedures.

While we have been diligent in our efforts to provide comprehensive and accurate regulatory training, Ross Business Development shall not be responsible for errors or inaccuracies."

The Enterprise Income Verification System LESSON INTRODUCTION

The purpose of this lesson is to provide guidance on using the data in EIV for verifying the employment and income of individuals participating in one of Multifamily Housing's rental assistance programs. The lesson also provides information about using the various reports.

Although using EIV is not mandatory at this time, using the data in EIV will assist in reducing errors in determining a resident's income, thereby reducing the number of improper payments in Multifamily Housing's rental assistance programs.

A LITTLE HISTORY

The UIV system was originally only available to PHAs and provided them with income information on wages and unemployment benefits provided through matching agreements with individual states. In 2004, HUD received authority to negotiate a matching agreement with the Department of Health and Human Services (HHS) to conduct computer matching with National Directory of New Hires (NDNH) data.

While the first matching agreement between HUD and HHS only made the NDNH data available to PHAs, a subsequent agreement was reached in FY 2007 making the information available to Multifamily Housing's O/As. The subsequent agreement allows HUD to disclose the NDNH information to:

- O/As for use in verifying, at the time of recertification, the employment and income of residents participating in one of Multifamily Housing's rental assistance programs
- Contract administrators (CAs) for monitoring the O/A's compliance with the recertification process and
- The Office of Inspector General (OIG) for investigative purposes

In addition to the NDNH data, the data received from the Social Security Administration (SSA), formerly available for use by O/As through the Resident Assessment Subsystem (TASS), is available through the EIV system.

EIV AND OTHER FEDERAL PROGRAMS

The EIV Social Security (SS), Supplemental Security Income (SSI), new hires (W-4), wage, and unemployment compensation information contained in the EIV system may only be used for limited official purposes.

- By Contract Administrators (CAs) for monitoring and oversight of the resident recertification process
- By the Office of the Inspector General (OIG) for investigative purposes.

- By owners/agents (O/As) for verifying the employment and income at the time of certification for residents participating in one of HUD's rental assistance programs listed below:
 - Project-based Section 8
 - New Construction
 - o State Agency Financed
 - o Substantial Rehabilitation
 - o Section 202/8
 - Rural Housing Services Section 515/8
 - Loan Management Set-Aside (LMSA)
 - Property Disposition Set-Aside (PDSA)
 - Rent Supplement
 - Rental Assistance Payment (RAP)
 - Section 202/162 Project Assistance Contract (PAC)
 - Section 202 Project Rental Assistance Contract (PRAC)
 - Section 811 PRAC
 - Section 236
 - Section 221(d)(3) Below Market Interest Rate (BMIR)

Official use **does not include** using the EIV data for certifying residents under the Low Income Housing Tax Credit (LIHTC) or Rural Housing Services (RHS) Section 515 programs.

Neither the Internal Revenue Service (IRS) nor RHS are a party to the computer matching agreements HUD has with the Department of Health and Human Services (HHS) and with the Social Security Administration (SSA).

The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs **does not** permit that federal agency to **use or view** information from the EIV system for certifying residents for their programs or for monitoring purposes.

This creates a challenge for those property managers who have properties with assistance layering. RBD suggests that you create a separate EIV verification file to ensure the privacy of EIV information. This means that you would keep a file of EIV printouts in a locked, secure file where the only access is by individuals responsible for HUD lease and HUD assistance activities.

For HUD certifications, document the resident file stating that EIV information has been used for HUD income verification and is maintained in a separate file for security purposes. You can make that file available to HUD or to Reviewers when you are participating in the HUD Management and Occupancy Review conducted using the HUD Form 9834.

You must use alternative verification for Tax Credit and RD verification purposes.

EIV POLICIES AND PROCEDURES

EIV is designed to be used as up-front income verification (UIV) for existing residents who are scheduled for an annual certification.

Because residents are required to report changes in income when the family's income cumulatively increases by \$200 or more per month, O/As may, but are not required to be, proactive in outreaching to their residents. This will help ensure timely reporting of income changes so that rent adjustments can be made in a timely manner, thus reducing retroactive rent repayments.

See Paragraph 7-10.A and the HUD Model Leases in Appendix 4 of Handbook 4350.3 REV-1 for the change in income reporting requirements.

O/As need to have written policies and procedures for using the EIV employment and income data and reports at the time of recertification. In addition, O/As who elect to use any of the reports at times other than at recertification. (e.g., the discrepancy and new hires reports) must also include in their policies and

procedures information for staff to follow for using the reports and data. Following written policies and procedures will ensure that tenants are treated fairly and not being discriminated against.

RESIDENT CONSENT

Before accessing the employment or income data 887 Packet contained in EIV for a resident, the O/A must make sure there is a signed and dated HUD-9887, Notice and

Consent for the Release of Information, and 9887-A, Applicant's/Resident's Consent to the Release of Information in the resident file. Each adult member of a household, regardless of whether he or she claims income, must sign this form

These forms authorize HUD and O/As to use data obtained through computer matching with another agency for verifying the individual's income. The form also authorizes HUD and the owner/a gent to seek wage, new hire (W-4) and unemployment claim information from current or former employers in order to verify information obtained through computer matching.

The head of household, spouse, co-head and each family member who is at least 18 years of age must sign and date the form at move-in and at each annual recertification. The form is valid for 15 months from the date of signature. With the introduction of EIV, we are asking owner/agents to think about the following changes to general policy.

- 1. In our opinion, you should get a new 9887 package for any household that was at market and will now be receiving assistance. We feel that a new 9887 Packet should be executed as part of the initial certification process.
- 2. Since EIV executes income matching for all adults, we have discovered a new challenge when a 17 year old turns 18 in the middle of a certification cycle. Since EIV requires confirmation of receipt of a signed 9887 for all adults, you must implement a process to obtain signatures for household members who turn 18 before the next certification.

See Paragraphs 5-15 and 5-21 of HUD Handbook 4350.3 REV-1, for more information on the HUD-9887 and HUD-9887-A forms.

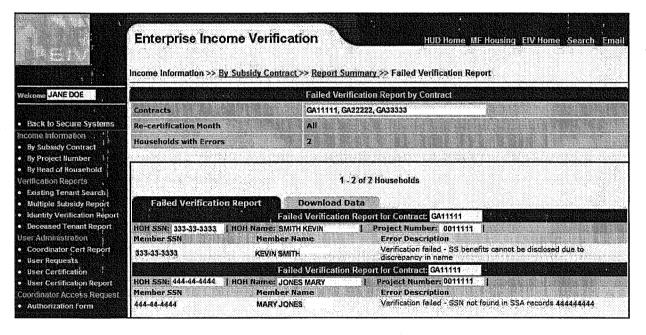
SCHEDULE FOR UPDATING EIV DATA

Currently, a daily update is provided each morning from TRACS. This data is uploaded into the EIV system the following evening. Therefore, there is a time lag of one day between the day certifications are received in TRACS and when information appears in EIV.

The personal identifiers for each resident in TRACS (Social Security Number (SSN), Last Name, and Date of Birth (DOB)) are matched against SSA's records. For those residents that **fail** the identity match against SSA's records:

- No employment or income information will be provided by SSA or HHS
- SSA will provide information on why the verification failed

This information is found in the EIV Failed Verification Report.



You should investigate the reasons that verification failed and correct appropriate certifications, if necessary. In our example, EIV indicates that Kevin Smith appears to have a discrepancy in his last name. When you check the resident file, you discover that Kevin spells his last name with a "y" (Smyth). You must correct the certification in your software and submit the correction to TRACS. Once identity verification is complete, EIV will continue the income verification process.

For those residents that pass the identity match against SSA's records, EIV will check to see if income information is available from the SSA or NDNH databases. If a resident's record indicates income:

- SS, SSI and dual entitlement benefit information will be provided
- W-4 (new hires), wage and unemployment compensation benefits will be provided

Although a resident passes the identity match against SSA's records, it does not guarantee there will be NDNH or SSA data in the EIV system. If the state or the SSA district offices do not update their records and forward the information to the NDNH or SSA master files, EIV will not have employment or income information for a resident.

In addition, if a resident is being paid "under the table" the information will not be included in the EIV databases.

Social Security Benefits

EIV uses the data from TRACS to perform a quarterly SS/SSI/Dual Entitlement Income match with the SSA. Each quarter the entire resident population is matched with SSA. Each month during a quarter, a group of residents are matched based on their next recertification month. The following chart shows when TRACS resident data is submitted to SSA by recertification month and when the data will be refreshed in EIV.

Group	Recertification Month	Month Data Is Refreshed in EIV
I	April, May, June, July	January, April, July, October
11	August, September, October, November	February, May, August, November
THE PERSON NAMED IN COLUMN 1	December, January, February, March	March, June, September, December

New residents are matched in month following admission (MI)/start of assistance(IC). These residents are included in the match with SSA even if they are not in one of the above groups.

The SSA match process begins at the beginning of each month with all of the data being loaded into EIV by the second week of the month. EIV retains the last eight actions processed by SSA for a resident.

Cost of Living Adjustments

The SSA cost of living adjustments (COLAs) are not available in EIV until the end of the calendar year. When processing Annual Certifications effective January 1, February 1, March 1, and April 1, you may:

 Use the benefit information reported in EIV that does not include the COLA as third party verification as long as the income data in EIV agrees with the income the resident reports he/she is receiving.

Request a current Award Letter when the income in EIV does not agree with the income the resident reports he/she is receiving, or the resident disputes the EIV data.

- Use the Award Letter provided by the resident if the resident has received his/her Award Letter that includes the COLA adjustment
- Determine the resident's income by applying the COLA increase percentage to the benefit amount in the Award Letter for the current award year or by applying it to the benefit reported in EIV that does not include the COLA

NDNH (W-4 New Hires, Wage and Unemployment Compensation)

Residents that pass the identity match with SSA are matched with the W4, new hires, wage, and unemployment benefit data contained in the NDNH. All active Multifamily residents who are at least 18 years of age and who passed the SSA identity match and who are not a live-in aide or a foster adult will be matched against the NDNH data. Live-in aides and foster adults are not matched with NDNH data since their income is excluded from annual income.

There are two types of matches against the NDNH data:

- 1. Monthly match –The entire eligible resident base is matched with the W-4 database and only the newly admitted residents are matched with the wage and unemployment benefit data.
- 2. Quarterly match —The entire eligible resident base is matched with the W-4, wage, and unemployment benefit data. The W-4 (new hires), wage and unemployment benefit data is loaded into EIV by the 20th of each month.

Month	Type of Match
January	Monthly
February	Quarterly
March	Monthly
April	Monthly
May	Quarterly
June	Monthly
July	Monthly
August	Quarterly
September	Monthly
October	Monthly
November	Quarterly
December	Monthly

EIV retains NDNH employment and income data for a resident for two years.

EMPLOYMENT AND INCOME DATA AVAILABLE IN EIV

Income information available in EIV comes from two sources:

- 1. Social Security Administration (SSA)
 - a. Social Security (SS) benefits
 - b. Supplemental security income (SSI) benefits
 - c. Dual entitlement benefits
 - d. Medicare premium information
- 2. National Directory of New Hires (NDNH)
 - a. W-4 (new hires)
 - b. Quarterly wages for federal and non-federal employees
 - c. Quarterly unemployment compensation benefits

Social Security Income

While the SSA provides information on Medicare premiums, it does not provide information on additional deductions such as Medicare Part D (prescription drugs), premiums, or garnishments.

You need to ask residents to disclose any deductions they may have from their SSA benefits and, when applicable, may need to request that the resident obtain a current Award Letter from SSA. For example, if the resident is paying his/her Medicare premium and the difference between the gross and net SS benefits exceeds the amount of the Medicare premium, you will need to:

- Discuss this with the resident
- Determine the reason for the difference and
- If applicable, obtain additional third party verification to support any of the deductions that may affect the resident's income or allowable expenses

Independent Third Party Verification

If the Social Security benefit information in EIV agrees with the amount that the resident reports, you may use the EIV information as third party verification for calculating the resident's income and if applicable, the Medicare premium paid by resident. You do not have to obtain independent third party verification to complement EIV data unless:

- The resident disputes the EIV data
- The resident is unable to provide acceptable and current income documentation (HHS Data only)
- There is incomplete EIV data for a resident; or
- There is no EIV data for a resident



If the information in EIV does not agree with the amount that reported by the resident, or when the resident disputes the EIV data, you must ask the resident to provide a current Award Letter from SSA. Information from the current Award Letter will be used as verification.

Residents who need to request a current Award Letter may request a new letter from SSA by calling 1-800-772-1213 (TTY 1-800-325-0778) or by requesting it over the internet at: https://secure.ssa.gov/apps6z/isss/main.html.

The need for additional third-party verification is always up to the discretion of the owner/agent based on circumstances encountered during the recertification process.

NDNH (W-4, Wage, and Unemployment Compensation)

The NDNH income information in EIV is **not** to be used to calculate the tenant's income without obtaining additional verification documentation from the resident, e.g., pay stubs, unemployment benefit information, etc.

If the information in EIV agrees with information provided by the resident, you may request current supporting documentation from the resident (most recent 6 to 8 pay stubs). Use the documentation provided by the resident to calculate income.

If the information in EIV does not agree with the amount that reported by the resident, or when the resident disputes the EIV data, you must obtain third party verification directly from the employer for use in determining the tenant's income.

When no employment or income information is available in EIV and the tenant reports he/she is working, request third party verification directly from the employer.

There may also be times when you need to request third party verification directly from the source in order to have all of the information needed to determine income. For example, employers are not required to report the "Hire Date" when submitting their data to the state; therefore, you may need to obtain third party verification for new employment to obtain this information.

Note: If the employer does not respond to requests for verification, use alternative verification methods provided in HUD Handbook 4350.3 Revision 1, Change 2, Chapter 5 (review of documents/family certification). You must include in the resident file, the reason 3rd party verification was not obtained.

EIV AND RECORD KEEPING (FILE MAINTENANCE)

Most of you are familiar with HUD Record Keeping requirements outlined in HUD Handbook 4350.3 Revision 1, Change 2 Paragraphs 4-22 and 5-23. In addition, HUD has clarified record-keeping requirements for data retrieved through EIV.

- 1) Social security benefit reports -term of tenancy plus 3 years
- 2) New hires (W-4), wage, unemployment compensation -no more than 2 years
- 3) Resident has both social security benefits and employment or wage information no more than 2 years

It is best to "purge" EIV printouts at annual certification. You must document the resident's file when information is destroyed. When documenting this action, provide information about when and how the information was destroyed.

NEW EIV SECURITY AWARENESS TRAINING QUESTIONNAIRE

There are two Security Awareness Questionnaires available on the HUD web site http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/securityawareness.pdf.

- 1. Security Awareness Training Questionnaire for EIV Coordinators
- 2. Security Awareness Training Questionnaire for EIV Users

All current Coordinators and Users must complete the appropriate Questionnaire. Coordinators must require new EIV Users to review the EIV security training materials and should refuse to authorize access until each user has provided the completed questionnaire. Coordinators should collect the completed questionnaire when the user submits the required User Access Authorization Form.

Please note that completion of the appropriate questionnaire is voluntary. However, HUD's Multifamily Helpdesk cannot approve EIV Coordinator applicants, whether for new or recertification of existing access, who do not complete and sign the appropriate security awareness training questionnaire; and, approved EIV Coordinators cannot approve EIV User applicants, whether for new or re-certification of existing access, who do not complete and sign the appropriate questionnaire.

Maintain this information in an EIV File to illustrate compliance with HUD's Security Protocol during your next Management and Occupancy Review. If you have access to EIV, the file should include:

- The Owner Access Authorization Letter
- The executed Coordinator Access Authorization Form
- User Access Authorization Forms for all EIV Users
- Completed Security Awareness Questionnaire for all EIV users/coordinators

HOW TO OBTAIN EIV ACCESS

We are still getting many calls from property managers who are trying to get access to the EIV system so we thought we would give you the "Readers Digest" version of the process.

If you do not have your own user name and password, you must first apply for a user name and password using the "Apply for User ID and Password" option available from several HUD web pages. We access this information through the TRACS web page at www.hud.gov/offices/hsg/mfh/trx/trxsum.cfm.

DO NOT SHARE USER NAMES AND PASSWORDS!!

#1 - Obtain a coordinator M-ID (an ID must be obtained by the coordinator and each user), activate the business partner relationship for all properties and set up roles, actions, and property assignments.

At this point, do not set up any of the EIV Roles yourself and do not assign EIV functions to any users. Additional EIV setup requirements are described below. For additional information about obtaining access to Secure Systems, which includes TRACS, APPS, REMS, REAC and EIV (as well as other HUD databases), visit the HUD web site at http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf

If you already have a coordinator M-ID, and are assigned to the properties for which you want to act as the EIV Coordinator, then you can move on to step 2.

If you have a user ID and not a coordinator ID, and you are going to be the EIV coordinator, you must upgrade the user ID to a coordinator ID before you can become the EIV Coordinator (you do not have to be a coordinator to access EIV data only to grant access rights to other users). To upgrade your ID, you must fax a letter to the attention of WASS at 202-485-0280 providing the applicant's M-ID, the owner entity tax ID, and ask to be upgraded to a WASS Coordinator. The letter must be on company letterhead and signed by the owner.

For further guidance and information about applying for a WASS ID or WASS Coordinator Role, contact the Real Estate Assessment Center (REAC) Technical Assistance Center (TAC) team at 1-888-245-4860.

- **#2 -** Obtain a letter of authorization from the <u>owner</u> of each property/contract indicating that you are authorized to act as the EIV coordinator. A sample letter can be accessed from our web site at http://www.rbdnow.com/noticesforms.htm
- #3 Review the appropriate training materials and complete the Security Awareness Questionnaire for EIV Coordinators. The questionnaire can be found at www.hud.gov/offices/hsq/mfh/rhiip/eiv/securityawareness.pdf

- **#4 -** Once you have obtained the letter from the owner and completed the Security Awareness Questionnaire, complete and sign a copy of the Coordinator Access Authorization Form and
 - Email the form to Mf_Eiv@HUD.gov or
 - Fax it to Multifamily Helpdesk via fax at: 202-401-7984

Be sure the form is filled out completely and correctly, if it is not you will be contacted via telephone to so that you can understand what information is missing or incorrect. The Coordinator Access Authorization Form is available on the HUD/EIV web site at www.hud.gov/offices/hsg/mfh/rhiip/eiv/coordinatoraccess.pdf

You only need to send the Coordinator Access Authorization Form (CAAF). Do not send the Multifamily help desk team the letters from the owners, user access forms or copies of completed Security Awareness Questionnaires. However, these documents must be kept on file and produced upon request by HUD staff or HUD's agents.

- **#5 -** At this point you must wait for the Multi-family help desk staff to execute the form and set up the EIV Coordinator Role. **No one, other than HUD staff, can complete this step**. If you do not hear from the Multi-family help desk within a couple of days, you must follow up with them by phone or email. Multifamily Helpdesk 800-767-7588. They are open from 9:00 AM until 8:00 PM EST.
- #6 You must also ensure that all users have reviewed the EIV documentation and that each user completed the User Security Awareness Questionnaire for EIV Users. You can find a copy of the Questionnaire at www.hud.gov/offices/hsg/mfh/rhiip/eiv/securityawareness.pdf. You should keep a copy of the Security Awareness Questionnaire, for each user, with the User Access Authorization Request.

For additional information about EIV Security Guidance and use of the EIV database, you should access the EIV web site. www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivapps.cfm.

#7 – While the Help Desk staff are processing the coordinator request, you should obtain a User Access Authorization Form and completed Security Awareness Questionnaire from every user who will require access to EIV. The User Access Authorization form is available on the HUD/EIV web site at www.hud.gov/offices/hsg/mfh/rhiip/eiv/useraccess.pdf

These forms must be completed, signed and on file for EVERYONE who will be assigned access to EIV. You must obtain an executed User Access Authorization Form and Security Awareness Questionnaire from users **BEFORE** you provide any user with access to EIV.

If someone does not require access to EIV, do not give them access. This information is extremely sensitive and falls under protections of the Privacy Act. The information may be used <u>only</u> to verify income for the <u>HUD</u> multi-family housing program and to identify potential

discrepancies between identity information and/or income reported by the resident and income included in the Social Security databases.

#8 – The Multi-family Help Desk staff will contact you via email to let you know when your HSC (Non-HUD User – EIV Housing Coordinator) Role has been set up. You will also get a signed copy of the last page (signature page) of the CAAF from faxed to the fax number listed on your access request. This signed form, along with the owner letters, must be kept on file for review during your next MOR.

#9 –Complete the setup process for your coordinator ID. The steps to complete setup are below: You can complete these steps <u>after</u> you have received the confirmation email from the Multi-family Help Desk.

- A. Access User Maintenance from the Main Menu
- B. Enter the coordinator MID
- C. Click on the "Search for User" button
- D. Choose the option "Property Assignment Maintenance" from the drop down box
- E. If you are a coordinator for multiple properties and you want to set up multiple properties at once, just verify that the MID is correct and click (you need to enter the role code as HSC (if coordinator) This is covered in the User Manual also "Submit" or enter the appropriate Tax ID or Contract Number for a single property
- F. Highlight the MF-EIV Non HUD User option in the top "Assign Roles" window. Then, in the Property ID window, highlight the properties you have been authorized to access (Standard windows UI is available here so you can choose a range of properties by clicking on the first property and shift/clicking on the last property or you can choose selected properties by using the ctrl/click option.)
- G. Click "submit" and then "Confirm"
- H. Access EIV from the Secure Systems Main menu
- I. Click on the Authorization Request
- J. Complete the appropriate fields
- K. Submit the Request
- L. Wait for HUD to certify you as the coordinator

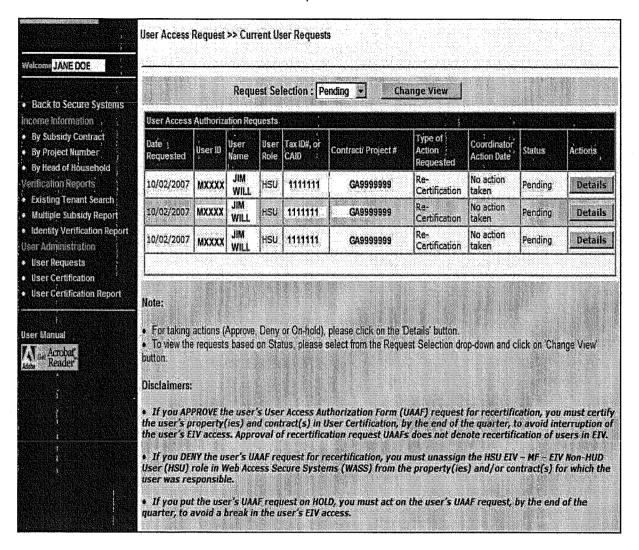
Coordinators will have to complete the Electronic Authorization Request every year in order to maintain access to EIV.

#10 – Once HUD has certified you as the coordinator, you can set up access for users who have executed the User Access Authorization Form and the Security Awareness Questionnaire. To do this, complete the following steps for each user.

- A. Access User Maintenance from the Main Menu
- B. Enter the user MID and then
- C. Click on the "Search for User" button
- D. Confirm that you have the correct user
- E. From the drop down box, choose the "Maintain User Profile Roles" option and click "submit"

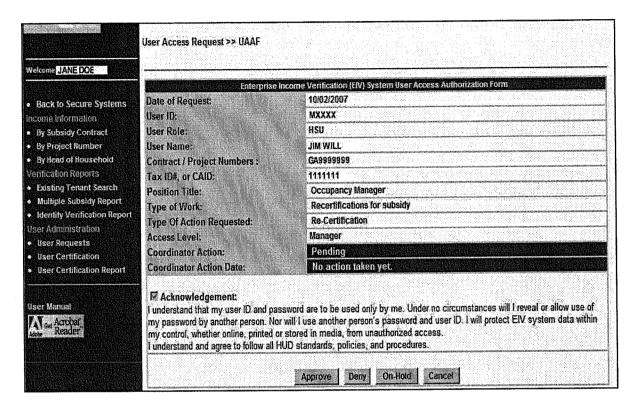
- F. Scroll down to the EIV options and click the check box to add a checkmark to the Option "HSU MF Non-HUD User" and click on the "Assign/Unassign Roles" button.
- * G. Confirm your choice
 - H. You will be returned to the User Maintenance Screen for this user
 - I. Choose the option "Property Assignment Maintenance" from the drop down box and continue
 - J. If you are a coordinator for multiple properties and you want to set up multiple properties at once, just verify that the MID is correct and click (you can/should use the HSU role as described in step F above) "Submit" or enter the appropriate Tax ID or Contract Number for the property
 - K. Highlight the MF-EIV Non HUD User option in the top "Assign Roles" window
 - L. Then, in the Property ID window, highlight the properties to which this user should have EIV access (standard windows UI is available here so you can choose a range of properties by clicking on the first property and shift/clicking on the last property or you can choose selected properties by using the ctrl/click option)
 - M. Click "submit" and then "Confirm"
 - N. The User Must then log in to Secure Systems and access EIV by clicking on EIV from the Secure Systems Menu
 - O. The User must click on the Authorization Request
 - P. The User must click on Create New Request
 - Q. The User must provide information in the appropriate fields
 - R. The User must submit the Request
 - S. Now, the Coordinator must go to EIV
 - T. Click on the User Requests option on the left
 - U. View All Requests
 - V. Approve or Deny Requests as appropriate
 - W. Click on the User Certification option on the left
 - X. Choose to Show New Users
 - Y. Place Checks in the boxes next to the Users/Properties you wish to certify
 - Z. Click on the "certify" button

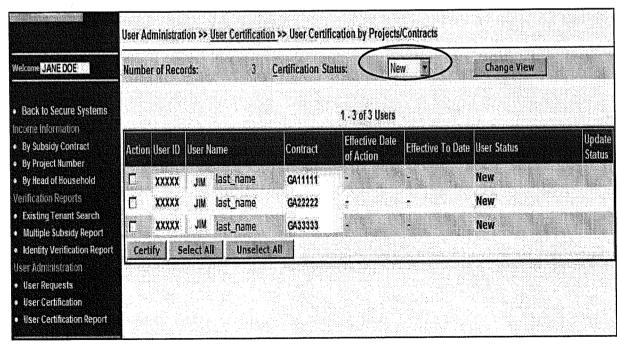
First, the coordinator must view the User Requests.



Then the Coordinator must choose what they want to do with the request:

- Approve the Request
- Deny the Request
- Put the Request On Hold

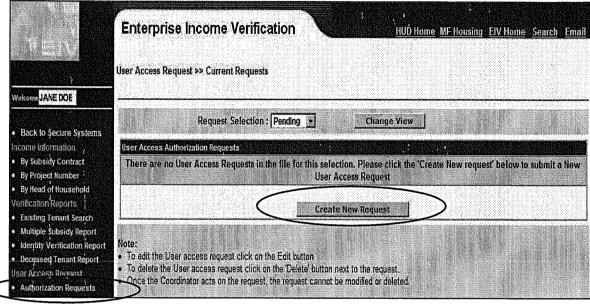


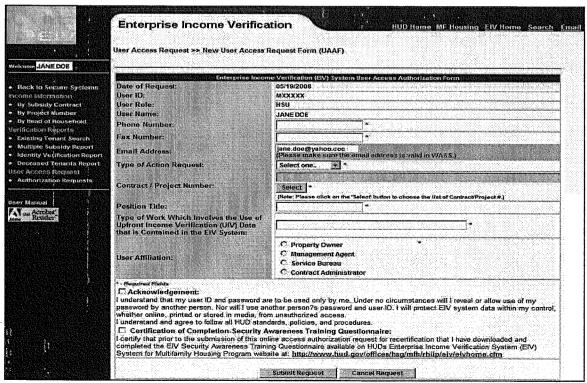


Users must be certified on a quarterly basis. <u>Users that have not been certified by the certification deadlines will be denied access</u>. The certification cycle for each year is:

- January 1 through January 30 (January, February, March)
- April 1 through April 29 (April, May, June)
- July1 through July 30 (July, August, September)
- October 1 through October 30 (October, November, December)

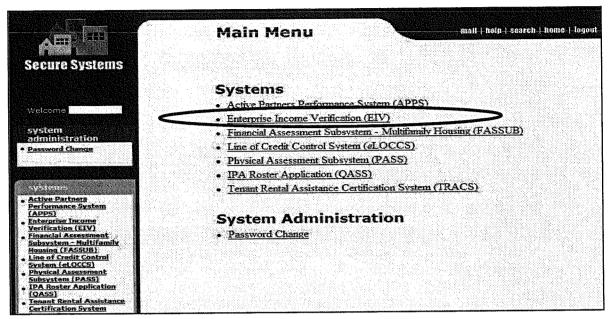
Users must request re-certification and the coordinator must approve the request and recertify the user or access will be terminated.



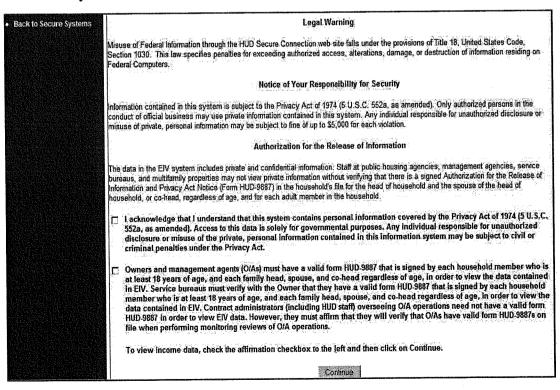


USING EIV

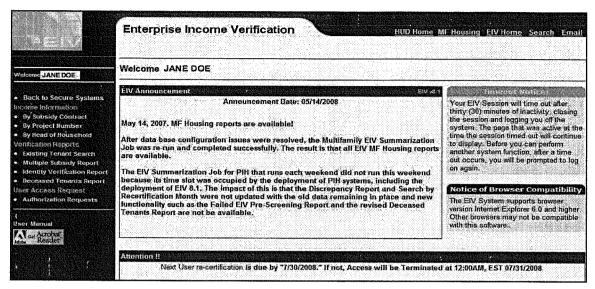
Once you have logged in to Secure Systems, click on the link to the EIV Menu Option.



When you choose to access EIV from the Secure Systems Main Menu, you must verify that you understand the nature of the information you will be viewing. You must also acknowledge that the information is protected by the Privacy Act. You must check each box before EIV will let you continue.



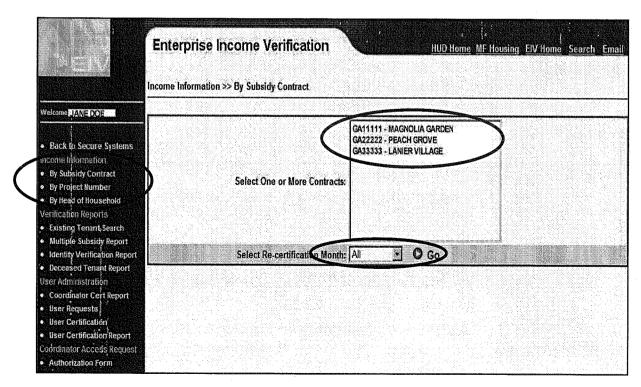
Once you have successfully logged in, you will see an announcement page with various HUD/EIV information.



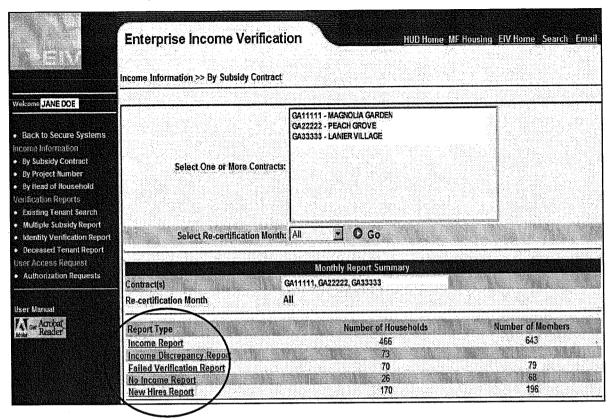
INCOME INFORMATION

Most users access EIV to obtain Income Verification reports. You can do this by referencing the Income Information. You can run income reports:

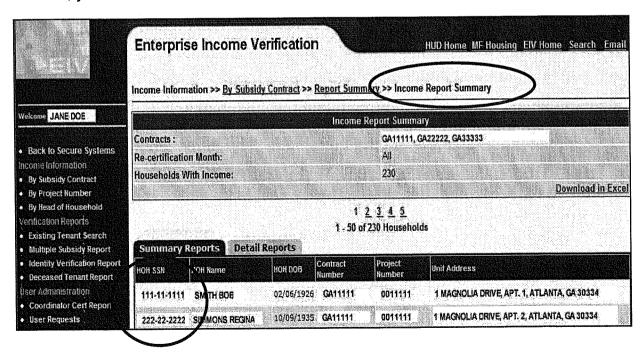
- By contract
- By project
- By HOH Social Security Number



Click on the "Income Report" link to access the income reports.



The income report summary is displayed. To get additional information about a particular household, you can click on the HOH SSN.



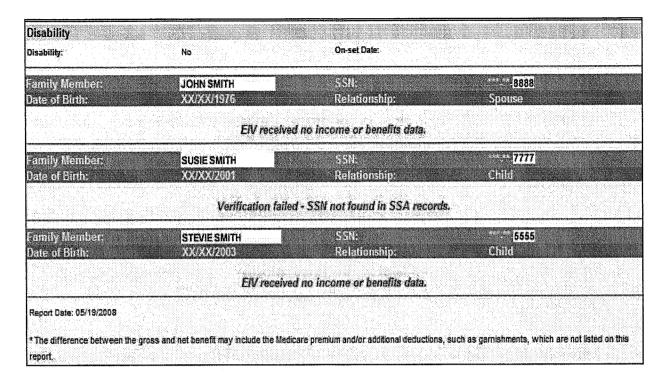
First, you will view the summary information. This provides a synopsis of the status of each household member.

Head of Hou	sehold Identifiers		1 1		į.		
Name:		Si	ARAH SMITH				
Social Security Number:			*******-9999				
Date of Birth (mm/dd/yyyy):			XX/XX/1973				
Contract Number:			A11111				
Project Number:			11111				
Project:			AGNOLIA GARDENS				
Unit Address:			MAGNOLIA DRIVE, A	TLANT	TA, CA 30335		
Next Re-cert	fication Date:		9/01/2008				
Tenant Data from Form 50059 as of:			0/02/2007				
Most Recent Type of Action:			R-Annual Recertific	ation			
Effective Date:			9/01/2007				
			Family Member				
Lember 881	Member First Name	Member Last Name			Relationship	Identity Verification Status	
- ₉₉₉₉	SARAH	SMITH	XX/XX/1973		Head of Household	Verified	
***-**-8888	JOHN	SMITH	XX/XX/1976		Spouse	Verified	
***** 7777	SUSIE	SMITH	XX/XX/2001	7	Child	Failed	
***-**-5555	STEVIE	SMITH	XX/XX/2003	5	Child	Verified	
TES LES LA	f dayualuan in the ∩-t-	of Dight Gald have bee					
	d day values in the Date	ui Diitti ileid nave Dee	n masked for securi	ny rea:	SOIIS.		

Detailed information is accessed via the report tabs at the top of the screen

Summary R	eport Income Re	income i	Discrepancy Report			
	V	age and Benefit R	eport for Household of SAF	RAH SMITH		
Contract Num	lier	GA11111		Subsidy Type	Section 8	
Project		MAGNOLIA	GARDENS	Project Number	5565555	
Next Re-certif			10/02/2007			
Address:		1 MAGNOLIA DRIV				
Most Recent 1	ype of Action:	AR-Annual	Recertification	Effective Date: 09/01/2007		
Head of Hous	ehold: SARAH SMITH					
Social Securi	ty Number: ***	**-9999	Date of Birth:	XX/XX/197	3	
-amily Membe Date of Birth:		RAH SMITH XXX/1973	SSN: Relationship:	***** 999 Head of	99 Household	
	Employment (W4) data					
Wages Pay Period	Amount FEIN	Employer Name	and Address		ate Received by EIV	
Wages		Employer Name University of Cal	and Address IFORNIA AT SAN DIEGO JOLLA CA 92093-5004		ate Received by EIV	
Wages Pay Period	Amount FEIN	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004	02		
Wages Pay Period Q3 of 2007 Q2 of 2007	Amount FEIN \$4,585.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004	OZ	D16/2008	
Wages Pay Period C3 of 2007	Amount FEIN \$4,585.00 XXXXXXX \$6,877.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO	01	V16/2008 I/18/2008	
Wages Pay Period Q3 of 2007 Q2 of 2007 Q1 of 2007	Amount FEIN \$4,585.00 XXXXXXX \$8,877.00 XXXXXXX \$9,034.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA REHRIG MFG CO 4010 E 26TH ST, LO	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 S ANGELES CA 90023-4601	01	V16/2008 I/18/2008 I/18/2008	
Wages Pay Period 03 of 2007 02 of 2007 01 of 2007	Amount FEIN \$4,585.00 XXXXXXX \$8,877.00 XXXXXXX \$9,034.00 XXXXXXX \$4,445.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9600 GILMAN DR, LA REHRIG MFG CO 4010 E 26TH ST, LO UNIVERSITY OF CAL 9500 GILMAN DR, LA	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 S ANGELES CA 90023-4601 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004	02	V16/2008 I/18/2008 I/18/2008	
Wages Pay Period Q3 of 2007 Q2 of 2007 Q1 of 2007 Q4 of 2008	Amount FEIN \$4,585.00 XXXXXXX \$6,877.00 XXXXXXX \$9,034.00 XXXXXXX \$4,445.00 XXXXXXX \$3,602.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA UNIVERSITY OF CAL 9500 GILMAN DR, LA REHRIG MFG CO 4010 E 26TH ST, LO UNIVERSITY OF CAL 9500 GILMAN DR, LA BEVERSON CONSTR 9054 MONTE MAR D	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 S ANGELES CA 90023-4601 IFORNIA AT SAN DIEGO	01	D16/2008 I/18/2008 I/18/2008 I/18/2008	
Wages Pay Period 03 of 2007 02 of 2007 04 of 2008 03 of 2008	Amount FEIN \$4,585.00 XXXXXXX \$8,877.00 XXXXXXX \$9,034.00 XXXXXXX \$4,445.00 XXXXXXX \$3,602.00 XXXXXXX \$6,419.00 XXXXXXX	Employer Name UNIVERSITY OF CAL 9500 GILMAN DR, LA REHRIG MFG CO 4010 E 28TH ST, LO UNIVERSITY OF CAL 9500 GILMAN DR, LA BEVERSON CONSTE 9054 MONTE MAR D REHRIG MFG CO	IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 S ANGELES CA 90023-4601 IFORNIA AT SAN DIEGO JOLLA CA 92093-5004 RICCTION MASONRY INC	01	V16/2008 I/18/2008 I/18/2008 I/18/2008	

Dual Entitlem	o benefit data.		
Dual Entitlem			
	nent		
EIV received in			
400-40-50000000000000000000000000000000	o benefit data.	A STATE OF THE STA	the state of the s
Social Securi			
Unemployme EIV received n	ent Benefits io benefit data.		
		4010 E 28TH ST, LOS ANGELES CA 90023-4801	SECTE ALLEGANS
Q4 of 2005	\$8,005.00 XXXXXXX	REHRIG MFG CO	01/18/2008
Q1 of 2005	\$8,263.00 XXXXXXX	NOT AVAILABLE.	01/18/2008
Q1 of 2008	\$7,802.00 XXXXXXX	REHRIG MFG CO 4010 E 26TH ST, LOS ANGELES CA 90023-4601	01/18/2008
Q2 of 2006	\$4,635.00 XXXXXXX	BEVERSON CONSTRUCTION MASONRY INC 9054 MONTE MAR DR, LOS ANGELES CA 90035	01/18/2008
Q2 of 2008	\$7,043.00 XXXXXXX	UNIVERSITY OF CALIFORNIA AT SAN DIEGO 9500 GILMAN DR, LA JOLLA CA 92093-0926	01/18/2008
Q2 of 2008	\$7,151.00 XXXXXXX	REHRIG MFG CO 4010 E 28TH ST, LOS ANGELES CA 90023-4601	01/18/2008
	\$7,649.00 XXXXXXX	BEVERSON CONSTRUCTION MASONRY INC 9054 MONTE MAR DR, LOS ANGELES CA 90035-4227	01/18/2008
Q3 of 2006		9500 GILMAN DR, LA JOLLA CA 92093-5004	01/18/2008



Let's look at a report displaying Social Security income information.

	EXPERIENCE CONTRACTOR	me Discrepancy Report		
44.0	Wage an	nefit Report for Household of <mark>DIA</mark>	THE RESERVE OF THE PROPERTY OF	
Contract Number		M	Subsidy Type	Section 8
roject:		IOLIA GARDENS	Project Number	11 111111
Next Re-certification Date: 03/01/. Address: 1 MAG		/2008	Form 50059 as of:	05/11/2007
		NOLIA WAY, ATLANTA, GA 30335		
Nost Recent Type of Action:		nnual Recentification	Effective Date:	03/01/2007
lead of Household: DIANE STE	VENS			
Social Security Number:	***-***-1111	Date of Birth:	XX/XX/194	13
amily Member.	DIANE STEVEN	SSNE	111	11
ate of Birth:		Relationship	Head of	Household
mployment Information				
IV received no Employment (W	4) data.			
Vages				
IV received no income data.				
Laurence Dan Str		10 Page 10 Pag		
Inemployment Benefits				

Social Security Benefits					
Ver	ification Data			Benefit His	tory
Payment Status Code: Date of Current Entitlement	C - Gurrent payment status (except railroad payment) 12/1980	Date 12/2007 12/2008	Gross B \$429.00 \$420.00	lenefit Ben	efits paid ∈fits paid
Net Monthly Benefit if Payable: Payee Name and Address:	S429.00 DIANE STEVENS 1 MAGNOLIA WAY	12/2005 12/2004	\$406.00 \$390.00	Ben Ben	efits paid efits paid
	APT. A-1 ATLANTA, GA 30335	12/2003 12/2002 12/2001 7/2001	\$380,00 \$372,00 \$367,00 \$358,00	Beri Ben	efits paid efits paid efits paid efits paid
		Lump Sum Date			ount
		08/01/2007		50.0	
Dual Entitlement Ely received no benefit data.					10000000000000000000000000000000000000
Medicare Data					
Veri	fication Data Diane Stevens 1 MacNolla Way APT, A-1	Hospital Insur Supp. Med. In:	ance: \$0.00	l I	
	ATLANTA, GA 30335				
	ens				
Veri Payment Status Code:		Date	Payment H Federal Amount	listory of Ne State Amount	t Benefits Paid Type of Payment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current):	efits fication Data C01 - Current Pay \$228.00	Date 01/01/2008 01/01/2007	Federal	State	
Supplemental Security Bene Veri Payment Status Code: Alien Indicator: SSI Monthly Assistance Amount (Current); State Supplement Amount (Current); Payee Name and Address:	ofits fication Data C01 - Current Pay	01/01/2008	Federal Amount \$228.00	State Amount \$233.00	Type of Payment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current); State Supplement Amount (Current);	sits C01 - Current Pay \$228.00 \$233.00 DIANE STEVENS 1 MAGNOLIA WAY	01/01/2008 01/01/2007 04/01/2006 01/01/2008	Federal Amount \$228.00 \$223.00 \$217.00 \$217.00	State Amount \$233.00 \$233.00 \$233.00 \$209.00	Type of Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current): State Supplement Amount (Current); Payee Name and Address;	scription Data C01 - Current Pay \$228.00 \$233.00 DIANE STEVENS 1 MAGNOLIA WAY APT. A-1	01/01/2008 01/01/2007 04/01/2006 01/01/2006 05/01/2005 04/01/2005 04/01/2005	Federal Amount \$228.00 \$223.00 \$217.00 \$217.00 \$209.00 \$172.00 \$37.00	State Amount \$233.00 \$233.00 \$233.00 \$209.00 \$233.00 \$233.00 \$209.00	Type of Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Overpayment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current): State Supplement Amount (Current):	fication Data C01 - Current Pay \$228.00 \$233.00 DIANE STEVENS 1 MAGNOLIA WAY APT. A-1 ATLANTA, GA 30335	01/01/2008 01/01/2007 04/01/2006 01/01/2006 05/01/2005 04/01/2005 04/01/2005	Federal Amount \$228.00 \$223.00 \$217.00 \$217.00 \$209.00 \$172.00 \$37.00	State Amount \$233.00 \$233.00 \$233.00 \$209.00 \$233.00 \$233.00 \$223.00 \$5.00	Type of Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Overpayment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current): State Supplement Amount (Current); Payee Name and Address; Disability Visability:	S228.00 S233.00 DIANE STEVENS 1 MAGNOLIA WAY APT. A-1 ATLANTA, GA 30335	01/01/2008 01/01/2007 04/01/2006 01/01/2008 05/01/2005 04/01/2005 04/01/2005 03/01/2005	Federal Amount \$228.00 \$223.00 \$217.00 \$217.00 \$209.00 \$172.00 \$37.00	State Amount \$233.00 \$233.00 \$233.00 \$209.00 \$233.00 \$233.00 \$223.00 \$5.00	Type of Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Coverpayment Recurring Payment Recurring Payment
Veri Payment Status Code; Alien Indicator: SSI Monthly Assistance Amount Current): State Supplement Amount (Current); Payee Name and Address; Disability Report Date: 03/07/2008	S228.00 S233.00 DIANE STEVENS 1 MAGNOLIA WAY APT. A-1 ATLANTA, GA 30335	01/01/2008 01/01/2007 04/01/2006 01/01/2006 05/01/2005 04/01/2005 04/01/2005 03/01/2005	Federal Amount \$228,00 \$223,00 \$217,00 \$217,00 \$209,00 \$172,00 \$37,00 \$172,00	State Amount \$233.00 \$233.00 \$233.00 \$233.00 \$233.00 \$233.00 \$223.00 \$0.00	Type of Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Recurring Payment Overpayment Recurring Payment

No Information in EIV

In our experience, EIV provides information for about 70% to 80% of residents who are Social Security benefit recipients receiving HUD project-based assistance. This means that you will have to contact the Social Security Administration to obtain current benefit information.

If SSA will not provide you with the information, or charges fees that cannot be absorbed by the property, then you should ask your resident to request a recent copy of their benefit letter. Residents can request this information using the Social Security web site (www.ssa.gov) or by calling the Social Security Administration 800 number.

If EIV does not provide income reports for a particular household, there are two potential reasons:

- 1. The household failed the EIV verification
- 2. The household's last certification has not been recorded in TRACS

You should check the Failed Verification Report and the TRACS database to see if you need to correct previously submitted 50059s.

EIV DISCREPANCIES

Since Social Security and Income Discrepancies are no longer returned through the TRACS System, you are challenged with developing policies to address Discrepancies in HUD's Enterprise Income Verification System. Develop policies to check for income discrepancies at least at each resident's annual certification.

Discrepancy Analysis

Once the income discrepancy calculations are completed, EIV analyzes the results to determine whether an Income Discrepancy Report should be generated. The analysis compares the results to a pre-defined EIV system value – Discrepancy Cutoff.

The discrepancy between the actual annual income value and the projected income on HUD-50059 must be \$2,400 or more in order for EIV to generate a discrepancy report. The \$2,400 is based on the requirement that tenants must report to the O/A when the family's income cumulatively increases by \$200 or more per month – see Paragraph 7-10.A and the HUD Model Leases in Appendix 4 of Handbook 4350.3 REV-1.

For example, if the projected income for a household was \$10,000 but the actual income was \$14,000, the difference of \$4,000 is greater than the established cutoff value of \$2,400, qualifying it to appear on the report.

Conversely, if the projected income for a household was \$10,000 but the actual income was \$12,000, the difference of \$2,000 is less than that of the established cutoff value of \$2,400, disqualifying it from appearing on the report.

Identifying the Actual Income Reported During the Period of Income

Actual income information is used to evaluate the accuracy of an income projection. It is compared to the projected income value stored on the form HUD-50059 associated with the household. These values are:

Income Code	Type of Income
В	Business
F	Federal Wage
M	Military Wage
W	Nonfederal Wage
U	Unemployment
SS	Social Security
SI	Supplemental Security Income

Reported Annual Wages and Benefits from EIV Data – This field identifies the actual income reported to EIV for the designated Period of Income for Discrepancy Analysis.

Amount of Annual Income Discrepancy – This field identifies the value of the discrepancy in the annual income that caused the household to be included in the report data. Negative currency values are represented in parenthesis. For example, -\$800 is represented as (\$800). When this value caused the household to be included on the report, it appears in a bold typeface.

Amount of Monthly Income Discrepancy – This field identifies the value of the discrepancy in the monthly income that cause the household to be included in the report data. Negative currency values are represented in parenthesis. For example, -\$800 is represented as (\$800). When this value causes the household to be included on the report, it appears in a bold typeface.

Calculating Income Discrepancies

Once projected and actual income data has been captured, the discrepancy evaluation process begins. EIV conducts two separate evaluations during the Income Discrepancy Report generation process. The outcome determines whether the results should be included in the Income Discrepancy Report.

Income discrepancies are calculated in the following manner:

Discrepancy 1 – Entire period of consideration versus income projected is calculated as follows:

(Projected Annual Wages and Benefits from form HUD-50059) – (Reported Annual Wages and Benefits as derived from EIV data.)

Discrepancy 2 – Last quarter of period of consideration annualized against projection is calculated as follows:

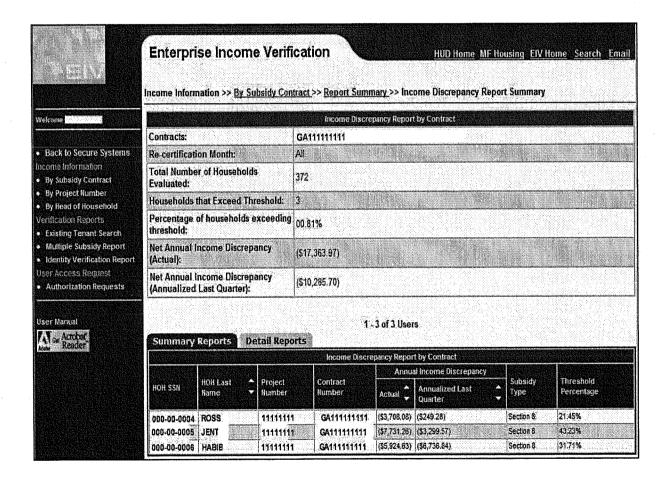
Actual EIV Income = final quarter income data (prorated as first and final quarter income in calculating total income for period of income against projection) * 4 quarters.

(Projected Annual Wages and Benefits from HUD-50059) – (Actual EIV Income)

Report Generation

The Income Discrepancy Report data gathering and calculations are computed automatically on a weekly basis. The data is collected, analyzed, and stored in the EIV database. Obsolete data is overwritten with the current data. If you are relying on data from a particular Income Discrepancy Report, print that report before it is overwritten.

When viewing the Income Discrepancy Report, it is important that you understand a few key points. The income discrepancy report compares the tenant's projected income reported on the form HUD-50059 to the actual income data compiled by EIV.



Name:	SARAH SMITH	
Social Security Number:	999-99-9999	
Contract Number	CA11111	
Project Number	111111	
Project	MAGNOLIA GAR	DENS .
Effective Date of Action:	09/01/2007	
Next Re-certification Date:	09/01/2008	
Projected Annual Wages and Benefits from Form HUD-50059:	\$27,448.00	
Period Of Income for Discrepancy Analysis	06/01/2006 - 05	/31/2007
Discrepancy Analysis	: Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$41,966.22	\$30,886.27
Amount of Annual Income Discrepancy:	(\$14,518.22)	(\$3,438.27)
Amount of Monthly Income Discrepancy:	(\$1,209.85)	(\$286.52)
Percentage of Income Discrepancy:	(34.6%)	(11.13%)

Identifying the Period of Income for Discrepancy Analysis

The Period of Income provides the timeline reference governing the collection of the data used to determine whether a discrepancy exists between projected household income (as reported on the HUD-50059) and actual income (EIV income data that was available at the time the projection was made). This period of income is established to gather the actual income data needed to make a comparison to the projected income and determine whether a discrepancy exists.

The Period of Income uses the following timeline of events to assist in determining the specific time span that will be taken into consideration when collecting and calculating income data.

Period of Income Start Date – This date represents the starting point for the income period. The Period of Income Start Date is 15 months prior to the effective date on the HUD-50059.

Period of Income End Date – This date represents the end of the Period of Income and is 3 months prior to the effective date on the form HUD-50059. This is the approximate period for the tenant interview. The Period of Income End Date is 12 months from the Period of Income Start Date.

Identifying Projected Income

Projected income information is used as the baseline for discrepancy calculations. It is derived from the HUD-50059 records stored in TRACS. The projected income is used to determine whether a given household should have an Income Discrepancy Report.

HANDBOOK GUIDANCE

It is important that you follow HUD's guidance if an income discrepancy report indicates that a resident is receiving unreported income. You should notify the resident that HUD's systems have returned information that indicates that the resident has failed to report income. This should be done in compliance with HUD Handbook 4350.3 Revision 1, Change 2, Paragraph 7-12-B

- B. "Owners must take the following steps upon learning that a resident failed to report a change in income or family composition, as stated in the lease.
 - 1. <u>Resident notification</u>. When owners learn that a resident has experienced a change in family income or composition listed in paragraph 7-11 A, they must immediately notify the resident in writing of his or her responsibility to provide information about such changes. The owner's notice must:
 - a. Refer the resident to the lease clause that requires the interim recertification;
 - b. Give the resident 10 calendar days to respond to the notice; and
 - c. Inform the resident that his or her rent may be raised to the market rent if the 10-day deadline is not met."

Employment Income/Unemployment Insurance Discrepancy

During the meeting, ask the resident if the information is accurate. If the information is accurate, have the resident sign appropriate verification release forms so that the hire date and income information can be verified with the employer.

If the resident claims that the information is invalid, have the resident sign appropriate verification release forms, and contact the employer listed in EIV to confirm the information provided by the resident.

Do not take adverse action based solely on the information provided by EIV. There can be several valid causes for errors that would preclude any action:

- 1. Human error
- 2. System Error (SSA/SSI/EIV/HHS)
- 3. Identity Theft If there is suspicion of identity theft, the resident should contact the Department of Justice and begin the process of reporting suspected identify theft.

Social Security Income Discrepancy

If the income discrepancy is returned based on an increase to SSA or SSI benefits the resident should let you know if the information is accurate. If so, an interim certification should be completed and submitted. You can use the EIV report as electronic third-party verification.

If the resident disputes the information provided by EIV, you should obtain a current benefit letter from the Social Security Administration. Do not use benefit letters that are more than 120 days old.

During the meeting, residents must sign the documents required to verify the information provided by EIV. If appropriate, submit a new certification reflecting the income difference. In some cases, you will correct the existing certification. In other cases, an interim certification may be required.

Effective dates of interim certifications should be determined using the guidance provided in HUD Handbook 4350.3 Revision 1, Change 2, Paragraphs 8-20 and 7-13 C & D.

7-13 Effective Dates of Interim Recertifications

- C. If the resident complies with the interim reporting requirements, rent changes must be implemented as follows:
 - 1. Rent increases. If the resident's rent increases because of an interim adjustment, the owner must give the resident 30 days advance notice of the increase. The effective date of the increase will be the first of the month commencing after the end of the 30-day period.
 - 2. <u>Rent decreases</u>. If the resident's rent will decrease, the change in rent is effective on the first day of the month after the date of action that caused the interim certification. A 30-day notice is <u>not</u> required for rent decreases.
- D. If the resident does not comply with the interim reporting requirements, and the owner discovers the resident has failed to report changes as required in paragraph 7-10, the owner initiates an interim recertification and implements rent changes as follows:
 - 1. <u>Rent increases</u>. Owners must implement any resulting rent increase retroactive to the first of the month following the date that the action occurred.
 - 2. <u>Rent decreases</u>. Any resulting rent decrease must be implemented effective the first rent period following completion of the recertification.

8-20 A. Resident's Obligation to Repay

- 1. The resident must reimburse the owner for the difference between the rent the resident should have paid and the rent he/she was actually charged, if the resident:
 - a. Fails to provide the owner with interim changes in income or other factors:
 - b. Submits incorrect information on any application, certification, or recertification; and
 - c. As a result, is charged a rent less than the amount required by HUD's rent formulas.
- 2. The resident acknowledges his/her obligation to make such reimbursements:
 - a. In paragraph 18 of the Model Lease for Subsidized Programs;
 - b. In paragraph 14 of the Model Lease for Section 202/8 or Section 202 PAC; and
 - c. In paragraph 12 of the Model Leases for Section 202 PRAC and Section 811 PRAC.

- 3. If the resident does not pay in full, an owner should enter into a repayment plan with the resident to collect these funds over a specific period of time.
- 4. The resident is not required to reimburse the owner for undercharges caused solely by the owner's failure to follow HUD's procedures for computing rent or assistance payments.
- 5. A resident must reimburse the owner for the total overpayment back to the date of admission if the following occurs:
 - a. The applicant submits information on income and family composition as the basis for the owner to make a determination that the applicant is eligible;
 - b. The applicant is admitted as a resident; and
 - c. It is later determined that the information was incorrect and the resident was not eligible for assistance.

NOTE: This holds regardless of whether the resident's circumstances later resulted in him/her being eligible for the assistance. In such cases, the resident would have to apply and be placed on the waiting list for assistance. In turn, the owner reimburses HUD in accordance with the procedures outlined immediately below.

6. The owner makes an adjustment on the monthly HAP voucher to reflect the amount of the resident's reimbursement of unauthorized assistance.

B. Owner's Obligation to Repay

- The owner is not required to reimburse HUD immediately for overpayments of assistance where the overpayment was caused by the resident's submission of incorrect information. Repayments are required when and as residents repay in accordance with an agreed-upon repayment plan.
- 2. The owner must reimburse HUD for all other overpayments of assistance where such overpayments were due to the owner's error or the owner's failure to follow HUD's procedures. HUD or the Contract Administrator may permit the owner to repay such overpayments in one lump sum or over a period of time through reduction of normal housing assistance requisitions if immediate repayment in full would jeopardize the financial condition of the property.

OTHER EIV REPORTS

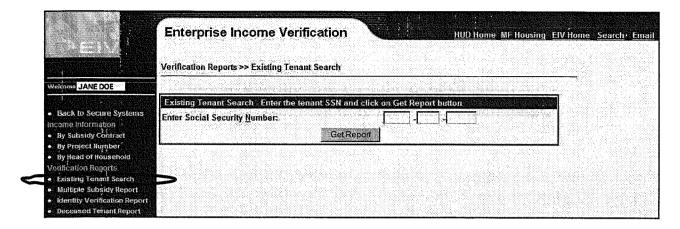
Exiting Tenant Search

One of the most exiting features of EIV is the ability to check to see if an <u>applicant</u> is currently a recipient of a voucher or if an applicant is receiving project-based assistance through HUD.

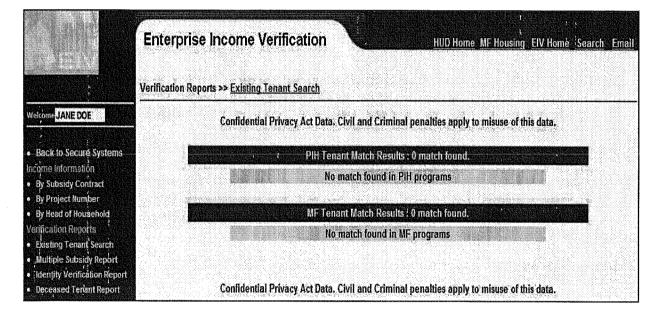
The Existing Tenant Search is the only report in EIV that provides information about applicants which means you can see this information before the applicant moves in.

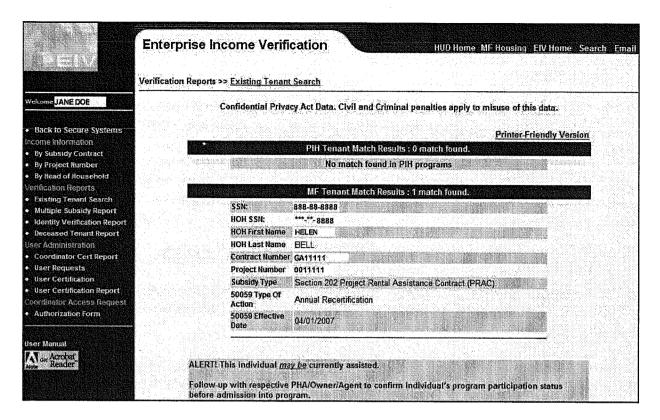
YOU MUST HAVE AN EXECUTED 9887 PACKET TO REVIEW THIS INFORMATION FOR ANY APPLICANT.

To check current status, choose the Existing Resident Search option.



Enter the applicant's social security number and you will get one of two results.



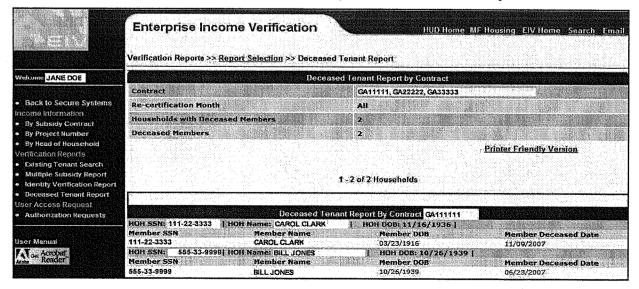


Please keep in mind that this "hit" indicates that the applicant **MAY** be receiving assistance. If a prior move-out was not recorded properly in TRACS or PIC, you could get a "false positive".

Deceased Tenant Report

Review the "Deceased Tenant Report" periodically to discover discrepancies in household member information. There are two things to look for here:

- A household member has died but the information is not recorded in TRACS
- A household member is using a deceased person's Social Security Number



Once again, if these discrepancies are discovered, request a meeting with the remaining household members or the resident and appropriate action should be taken.

New Hires Report

The New Hires Report provides employment information for residents who have started new jobs. The information in this report is updated monthly, and since most employers report information on new hires to their state within 30 days of the hire date, you may know, within 60 days, whether a resident has started a new job. Because residents are required to report changes in income (\$200 or more per month), you may be, but are not required to be, proactive in outreaching to residents so that rent adjustments can be made in a timely manner.

<u>WHAT TO DO WHEN EIV DISCREPANCIES CANNOT BE RESOLVED</u>

While EIV provides valuable information, there will be cases when information in EIV is inaccurate. Inaccuracies can be caused by both human error, database-sharing issues and, in some cases, fraud.

If a discrepancy is provided by EIV and you have investigated the error, you may find that EIV information is not correct and you are unable to resolve the error. If this is the case, your resident file should provide ample documentation explaining any action taken and why the discrepancy was not resolved.

Management and Occupancy Reviews are used to monitor efforts to ensure that the right assistance if provided to the right people. Reviewers may ask for information explaining unresolved discrepancies.

LESSON SUMMARY

Even when considering the initial access issues, implementation of EIV represents positive change for the multifamily industry. More frequent review of resident income data and enhanced reporting improves your ability to ensure that families are receiving the correct assistance. This change also increases your ability to monitor resident compliance.